

1 RONALD C. CHAUVEL (SBN 83182)
2 BRANDON L. REEVES (SBN 242897)
3 GREENE, CHAUVEL, DESCALSO & MINOLETTI
155 Bovet Rd., Suite 780
4 San Mateo, CA 94402
Telephone: (650) 573-9500
5 Facsimile: (650) 573-9689
ron@greenechauvel.com
brandon@greenechauvel.com

6 Attorneys for Plaintiff
De Sol Corp., Inc.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 (Oakland Division)

11 De Sol Corp., Inc., a California corporation,

12 Plaintiff,

13 vs.

14 Vegas Connection, Inc., a California
corporation; Omar Awad, an individual;
15 Jahangir Shahriari, an individual,

16 Defendants.
17
18

Case No. C07 4107 SBA

**DECLARATION OF BRANDON L.
REEVES IN SUPPORT OF MOTION TO
REOPEN CASE AFTER REPORTED
SETTLEMENT**

**Hearing Date: February 12, 2008
Time: 1:00 p.m.
Dept.: 3**

19 I, BRANDON L. REEVES, declare:

20 1. I am an attorney at law duly licensed to practice before this Court. I am an
21 associate at the firm of Greene, Chauvel, Descaso & Minoletti, attorneys of record for Plaintiff
22 De Sol Corp., Inc. in the above-entitled action. I submit this declaration in Support of Plaintiff's
23 Motion to Reopen Case After Reported Settlement.

24 2. On or about December 13, 2007, Plaintiff De Sol Corp. and Defendants Vegas
25 Connection, Inc., Omar Awad, and Jahangir Shahriari reached a tentative settlement in the
26 above-entitled action.
27

1 3. Defendants' attorney John Richards reported the tentative settlement to the Court
2 at that time and the Court issued its Order dated December 13, 2007, dismissing the action with
3 prejudice. The Court's Order indicated that any party could move to reopen the case within 30
4 days if the case in fact did not settle as reported.

5 4. The parties' tentative settlement is still in place, but the parties are still in the
6 process of working out the details and preparing all necessary settlement documents.
7 Accordingly, as the 30 day timeline in the Court's Order has expired or is about to expire,
8 Plaintiff respectfully requests that the Court reopen this case and schedule a Case Management
9 Conference, or another appropriate status hearing, as the Court deems proper, in light of the fact
10 that the action has not officially settled.

11 5. However, I anticipate the settlement will be finalized shortly and in all likelihood
12 the action will be dismissed by the parties before the aforementioned status hearing.

13 I declare under penalty of perjury under the laws of the State of California and the United
14 States of America that the foregoing is true and correct.

15 Dated: January 11, 2008

Brandon L. Reeves

Brandon L. Reeves